

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

ALICIA M. PAGE, CARMEL COOPER,
and CINDY MUNIZ, individually, and on
behalf of all others similarly situated,

Plaintiffs,

vs.

ALLIANT CREDIT UNION, and DOES 1-
100,

Defendants.

Case No.: 1:19-cv-05965

Hon. Sharon Johnson Coleman

DECLARATION OF JEFFREY C. BILS
IN SUPPORT OF PLAINTIFF ALICIA M. PAGE'S
MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT

I, Jeffrey C. Bils, declare and state as follows:

1. I am an attorney at law duly licensed to practice before all courts in the State of California. I am employed by The Kick Law Firm, APC, and counsel of record for Plaintiff Alicia M. Page in this action. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

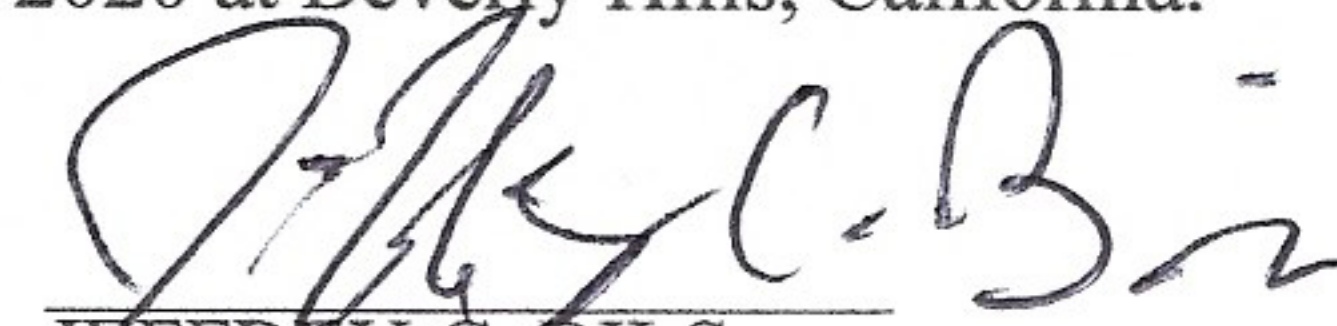
2. On August 27, 2020, I conducted research using the Internet Archive Wayback Machine at <https://archive.org/web/> to find past and present contracts, disclosures, fee schedules and related account documents for Defendant Alliant Credit Union. During this research, I found Alliant's Account Agreement and Disclosures dated August 2019. A true and correct copy of the Further Revised Contract that I found is attached as **Exhibit A**.

3. The Proposed Second Amended Complaint in the above-entitled action is attached as **Exhibit B**. It is identical in every respect to the First Amended Complaint already filed in this action on September 24, 2020, Dkt. No. 73, except as follows:

- The phrase “First Amended Complaint” has been replaced with the phrase “Second Amended Complaint”;
- The parenthetical phrase “(Dismiss with Prejudice, Re-Alleged for Proposed SAC)” has been deleted as to the Second Cause of Action (Breach of Contract), Third Cause of Action (Unjust Enrichment), and Fourth Causes of Action (Money Had and Received); and
- The date of submission has been changed to October 8, 2020.

4. True and correct copies of unpublished cases cited in Plaintiff’s Motion for Leave to File Second Amended Complaint are attached as **Exhibit C**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on October 8, 2020 at Beverly Hills, California.


JEFFREY C. BILS